

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ADELMAN TRUCK PARTS
CORPORATION,

Plaintiff,

v.

JONES TRANSPORT and DON JONES,

Defendants. _____

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) Case No. 5:17-cv-2598(JRA)
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**DECLARATION OF ATTORNEY JONATHAN R. MILLER IN SUPPORT OF
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Attorney JONATHAN R. MILLER hereby declares under penalties of perjury that the following statements are true to the best of his knowledge, information, and belief:

1. I am the attorney for the Defendant in above-captioned case and, therefore, I am fully knowledgeable regarding the facts and circumstances surrounding it.
2. I am making this Declaration in support of Defendant's Motion for Partial Summary Judgment.
3. I am attaching as **Exhibit A** a true and correct copy of Responses to Written Discovery I received from Plaintiff Adelman Truck Parts Corporation ("Adelman's").

4. I am attaching as **Exhibit B** a true and correct copy of the transcript of the deposition of Chris Ives, an Adelman's employee, in the above-referenced case.

5. I am attaching as **Exhibit C** a true and correct copy of a letter dated July 18, 2018 that I received from Michael Dillard, an attorney for Caterpillar, Inc.

6. I am attaching as **Exhibit D** a true and correct copy of an email dated September 20, 2018 that I received from Kip Bollin, an attorney for Caterpillar, Inc.

7. I am attaching as **Exhibit E** a true and correct copy of a chart that was attached to Mr. Bollin's September 20, 2018 email.

8. I am attaching as **Exhibit F** a copy of the sworn declaration submitted by Lee Bryan in opposition to Adelman's Motion for Summary Judgment.

9. For these reasons, I respectfully ask this Court to grant Mr. Jones's request for partial summary judgment, as to liability only.

Dated: Winston-Salem, NC
November 26, 2018

/s/ Jonathan R. Miller
Jonathan R. Miller